

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001

As relates to: 03 MDL 1570 (GBD) (SN)

BAKAHITYAR KAMARDINOVA, et al.

Civil Docket Number: 18-cv-05339

PLAINTIFFS,

**FIRST NOTICE OF AMENDMENT**

v.

ISLAMIC REPUBLIC OF IRAN,

ECF CASE

DEFENDANT.

This document relates to:

*Bakahityar Kamardinova, et al. v. Islamic Republic of Iran, No. 1:18-cv-05339 (GBD) (SN).*

Plaintiffs file this Notice of Amendment with respect to the underlying Complaint in the above-referenced matter, ECF No. 6 (the “Underlying Complaint”), as permitted and approved by the Court’s Order of May 25, 2018, ECF No. 4010, read with the Order dated April 27, 2018, ECF No. 3982. Upon the filing of this Notice of Amendment, the Underlying Complaint is deemed amended to add the individuals listed below (the “New Plaintiffs”) as plaintiffs raising claims against the Islamic Republic of Iran, and adopting the factual allegations, jurisdictional allegations, and jury trial demand of the Underlying Complaint and *Burnett* Iran Complaint, Docket Number 15-cv-9903 (S.D.N.Y.) (GBD)(SN) (ECF Doc. No. 53), as well as all causes of action specified below. The amendment effected through this Notice of Amendment supplements by incorporation into, but does not displace, the Underlying

Complaint. This Notice of Amendment relates solely to the Islamic Republic of Iran and does not apply to any other defendant.

### CAUSES OF ACTION

The New Plaintiffs hereby adopt and incorporate herein by reference the causes of action set forth in the Underlying Complaint and the *Burnett* Iran Complaint, Docket Number 15-cv-9903 (S.D.N.Y.) (GBD)(SN) (ECF Doc. No. 53).

New Plaintiffs are making such claim on the following basis, and incorporate by reference that supplemental information provided in the Identification of New Plaintiffs below, identifying the New Plaintiffs asserted basis for participating in this suit:

- ☐ Estate Wrongful Death Claim by Estate Representative on Behalf of an Individual Killed as a result of the September 11, 2001 Terrorist Attacks
- ☒ Solatium Claim by Immediate Family Member of an Individual Killed as a result of the September 11, 2001 Terrorist Attacks
- ☐ Personal Injury Claim by Individual Injured as a result of the September 11, 2001 Terrorist Attacks

### IDENTIFICATION OF NEW PLAINTIFFS

Each New Plaintiff is or was a survivor of a person who died due to the terrorist attacks of September 11, 2001. For each New Plaintiff, the following chart lists the New Plaintiff's name, the New Plaintiff's residency and nationality, the name of the New Plaintiff's deceased family member, the New Plaintiff's relationship to the decedent, and the paragraph(s) of the Underlying Complaint discussing the decedent and/or the decedent's estate.

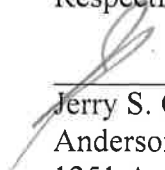
	<b>New Plaintiff's Last Name, First Name</b>	<b>State of Residency at Filing (or death)</b>	<b>Citizenship/ Nationality on 9/11/2001</b>	<b>Decedent's Name (alphabetical by last name)</b>	<b>New Plaintiff's Relationship to Decedent</b>	<b>Paragraphs of Complaint Discussing Decedent</b>
						<b>18-cv-05339</b>
101	Kane, Timothy	MA	United States	Kane, Jennifer L.	Brother	¶ 7

	<b>New Plaintiff's Last Name, First Name</b>	<b>State of Residency at Filing (or death)</b>	<b>Citizenship/ Nationality on 9/11/2001</b>	<b>Decedent's Name (alphabetical by last name)</b>	<b>New Plaintiff's Relationship to Decedent</b>	<b>Paragraphs of Complaint Discussing Decedent</b> <b>18-cv-05339</b>
102	Kane, Faye	MA	United States	Kane, Jennifer L.	Mother	¶ 7
103	Kane, Matthew	MD	United States	Kane, Jennifer L.	Brother	¶ 7
104	Bennett, Belinda	MD	United States	Kegler, Brenda	Daughter	¶ 10
105	Hunter, Andre	MD	United States	Kegler, Brenda	Brother	¶ 10
106	Kegler, Bing	FL	United States	Kegler, Brenda	Spouse	¶ 10
107	Royal, David	D.C.	United States	Kegler, Brenda	Brother	¶ 10
108	Kelly, Thomas	NY	United States	Kelly, Thomas W.	Son	¶ 12
109	Kelly, Francis	NY	United States	Kelly, Thomas W.	Son	¶ 12
110	Kennedy, Brian	VA	United States	Kennedy, Thomas	Brother	¶ 13
111	Kennedy, Robert	NY	United States	Kennedy, Thomas	Brother	¶ 13
112	Kennedy, William	VA	United States	Kennedy, Thomas	Father	¶ 13
113	Kennedy, Eileen	VA	United States	Kennedy, Thomas	Mother	¶ 13
114	Kennedy, James	NY	United States	Kennedy, Thomas	Son	¶ 13
115	Kennedy, Michael	NY	United States	Kennedy, Thomas	Son	¶ 13
116	Berliner, Dara	NY	United States	Kimelman, Mary Jo	Sister	¶¶ 15 & 16
117	Kimelman, Michael	NY	United States	Kimelman, Mary Jo	Brother	¶¶ 15 & 16
118	Kimelman, Scott	NY	United States	Kimelman, Mary Jo	Brother	¶ 15 & 16
119	Murray, Raymond	VA	United States	King, Lucille T.	Nephew	¶ 19
120	Murray, Robert	NJ	United States	King, Lucille T.	Nephew	¶ 19
121	Koecheler, Mary Jo	MN	United States	Koecheler, Gary E.	Sister	¶26
122	Koecheler, John	NY	United States	Koecheler, Gary E.	Son	¶ 26

	<b>New Plaintiff's Last Name, First Name</b>	<b>State of Residency at Filing (or death)</b>	<b>Citizenship/ Nationality on 9/11/2001</b>	<b>Decedent's Name (alphabetical by last name)</b>	<b>New Plaintiff's Relationship to Decedent</b>	<b>Paragraphs of Complaint Discussing Decedent</b>  <b>18-cv-05339</b>
123	Koecheler, Paul	NY	United States	Koecheler, Gary E.	Son	¶ 26
124	Schneider, Judy	MN	United States	Koecheler, Gary E.	Sister	¶ 26
125	Koecheler, Gene	CA	United States	Koecheler, Gary E.	Brother	¶ 26

Dated: June 24, 2018

Respectfully submitted,

  
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 COUNSEL FOR PLAINTIFFS

**CERTIFICATE OF SERVICE**

I hereby certify that on June ~~26~~<sup>26</sup>, 2018, I caused the foregoing Notice of Amendment, to be served via the Court's ECF system to all counsel of record in Case Number 03-MDL-1570 (GBD) (SN).



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Jerry S. Goldman